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VIA ECF

Honorable Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, New York 11201

Re: Mitchell McKenzie v. City of New York, et al.
19 cv 995 (ENV) (RER)

Your Honor:

Pursuant to the Court's July 7, 2020 order, the parties jointly submit this letter regarding the status of discovery.

As the Court may recall, on May 7, 2020, the Court granted a 90 day extension of discovery in this case due to the evolving disruption surrounding the COVID-19 pandemic. At present, discovery is scheduled to close on September 11, 2020, and the parties' final pre-trial conference is scheduled for September 15, 2020.

Discovery in this case is substantially complete, save for two items. First, plaintiff has yet to provide proper responses to defendants' discovery requests despite being asked for them several times. Second, the parties' depositions have yet to be completed. The parties are cognizant of the fact that depositions will almost certainly have to be done remotely, via video conference, due to the ongoing impact of the COVID-19 pandemic. The parties do not anticipate any difficulty in completing depositions prior to the current discovery deadline, provided defendants' request for discovery responses is timely answered.

The parties thank the Court for its consideration herein.

Respectfully submitted,

/s/ Katherine J. Weall

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cc: **VIA ECF**
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Attorney for Plaintiff